

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

THE EXCELLENT THE EXCELLENT RAJ  
K. PATEL, from all capacities,

*Plaintiff* No. 1:23-cv-08765-UA

v.

Dated: October 18, 2023

NEAL K. PATEL and SANJANA KUMAR,

JURY TRIAL DEMANDED

*Defendants*

**AMENDED MOTION TO FILE REDACTED COMPLAINT**

I, T.E., T.E. Mr. Raj K. Patel, AA, BA (Rama CCCX) (*pro se*), respectfully move this United States Southern District for the Southern District of New York to file a redacted version of the complaint only for compelling reason. Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110, 124-25 (2d Cir. 2006). In the alternative, Patel moves to seal the docket for compelling reason. Id. Erickson v. Pardus, 551 U.S. 89, 94 (2007) (all documents filed pro se are liberally construed).

- I. Sealing the complaint or redacting it does not invoke inquiry into the court's "power" or in any way "affect" it. Bernstein v. Bernstein Litowitz Berger & Grossmann LLP, 814 F.3d 132, 142 (2d Cir. 2016).
- II. The complaint discusses sexually explicit content of two minors. The content can end up being used for an inappropriate use.
- III. The complaint discusses name calling related to the depiction of those two minors. Public access to this information can become a vehicle for inappropriate use.
- IV. The complaint discusses intimate private religious information affecting the parties. 42 U.S.C. § 2000bb-1. No government policy, judicial purpose, or public's right

to access information is burdened by sealing particularized religious information.

Id. Coventry Cap. U.S. LLC v. EEA Life Settlements, Inc., 2017 WL 5125544 \* 2 (S.D.N.Y. Nov. 2, 2017).

- V. Public copies of the complaint can be prejudicial to on-going complaints and filings in the United States Court of Appeals for the Ninth Circuit, the Central District of California, and the Northern District of California. Patel v. His Majesty King Charles et al., 23-cv-7760 (C.D. Cal. 202\_), Patel v. Univ. of Notre Dame, No. 23-cv-6437 (C.D. Cal. 202\_), Patel v. United States, No. 23-cv-6281 (C.D. Cal. 202\_), Patel v. United States, No. 23-cv-7763 (C.D. Cal. 202\_), Patel v. Alphabet Inc. et al., No. 23-cv-03647 (N.D. Cal. 202\_), Patel v. Alphabet Inc. et al., No. 23-16181 (9th Cir. 202\_), Patel v. United States, No. 23-16178 (9th Cir. 202\_), and Patel v. United States, No. 23-55768 (9th Cir. 202\_).
- VI. Redacting or sealing the complaint will not harm the opposing parties.
- VII. Redacting or sealing the complaint will not harm the public.
- VIII. Redacting or sealing the complaint will respect the corporate veils of the corporations, B.C.S.C. and Emory University, where happenings with their territorial jurisdiction comes with inherent privacy and is important for their work. No corporate institutions exist to have resolved this matter justly, and this court has simultaneous powers to act as such judicial body.
- IX. Redacting or sealing the complaint will allow each Defendant to securely and in good faith file a response or amended complaint.

	PARAGRAPHS	REASON
1.	¶ 1(C) & (E)	Discussing sexually explicit material about minors. Discusses Patel's trade secrets.

2.	¶ 3	Discussing sexually explicit material about minors. Discusses Patel's trade secrets.
3.	¶¶ 6, 11, 19-20, 22, and 74	Calling me a name that is particular to minors in a sexually explicit profession. This is likely to be used for inappropriate use also by Christians, Muslims, Jews, the colonized, and the mentally disabled.

Patel moves that this court as a matter of gatekeeping allows for a redacted complaint to be filed, or to seal the documents.

Respectfully submitted,

/s/ Raj K. Patel  
 Rama CCCX  
 T.E., T.E. Raj K. Patel, AA, BA, JD Candidate\*\* (*pro se*)  
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T.E. Mr. President/Student Body President, Student Gov't Ass'n of Emory U., Inc. 2013-2014 (corp. sovereign 2013-present)  
 T.E. Mr. Student Body President, Brownsburg Cmty. Sch. Corp./President, Brownsburg High Sch. Student Gov't 2009-2010 (corp. sovereign 2009-present)  
 Rep. from the Notre Dame L. Sch. Student B. Ass'n to the Ind. St. B. Ass'n 2017  
 Deputy Regional Director, Young Democrats of Am.-High Sch. Caucus 2008-2009  
 Co-Founder & Vice Chair, Ind. High Sch. Democrats 2009-2010  
 Vice President of Fin. (Indep.), Oxford C. Republicans of Emory U., Inc. 2011-2012

Intern, Marion Cnty. Clerk Elizabeth "Beth" White for Sec'y of St. of the St. of Ind. 2014

\*\*J.D. Candidate, Notre Dame L. Sch. (2015-17)

Volunteer, Barack Obama for America (2008)

Intern, Jill Long Thompson for Governor (2008)

\*Political Science and Religion (cum laude), Emory University  
Class of 2014

**CERTIFICATE OF SERVICE**

I certify that I served a copy of the foregoing Am. Motion to File Redacted Complaint on 10/18/2023 to below individuals via the Clerk of Court:

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Respectfully submitted,

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